



## COMPLIANCE & AML DUE DILIGENCE FORM\*<sup>Á</sup>

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## **Part I. Covenant of Compliance**

- **Commitment to comply, when using CDP funds, with the relevant principles and standards**                                                       

                                                        

                                                        

                                                        

                                                        

                                                        

                                                        

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## Part II. Fund Details

- **Section 1 (Fund Manager Profile)**
- **Section 2 (Fund Manager Beneficial Ownership)**
- **Section 3 (Fund Profile)**

### **Part III. Compliance policies, procedures and standards**

*\*The information and documentation required under this document may not need to be provided if they have already been made available to CDP by other means or through other documents requested by CDP (in such cases, please provide relevant details in your response)*



## PART I. COVENANT OF COMPLIANCE

**Without prejudice to any representations, warranties, undertakings or other statements given or agreed in contracts, in finance documents or in other related or similar documents, in the case that the Entity enters a contractual relationship with CDP, it represents and warrants the following:**

A) represents and warrants, to all legal effects and also with regards to Entity's Group companies involved in the activities that will benefit from CDP support and their respective directors, managers and employees, that to its knowledge:

*Please tick the box to confirm provision of the representation*

No legal proceedings nor formal investigations or judgment or administrative, interdictory and/or preventive measure is pending or has been issued in the last five years, against it, and to the best of its knowledge its directors and managers, the Fund manager and its directors and managers for a violation of

- (i) anti-bribery laws and/or
- (ii) anti-money laundering and combating terrorism financing laws, and/or
- (iii) applicable laws on corporate liability (including Italian Legislative Decree 231/2001 and equivalent laws) and/or
- (iv) legislative and regulatory requirements applicable to the Fund Manager, including requirements on internal controls and/or
- (v) export control measures and/or restrictive measures (International Sanctions).

Neither it nor to the best of its knowledge its directors and managers, the Fund manager and its directors and managers

- (i) are owned or controlled or acting on behalf of individuals or entities which are subject to assets or economic resources freezing measures or any further restrictive measure issued by the Office of Foreign Assets Control of the US Department of Treasury (OFAC), the US Department of State or of any other equivalent measure of the European Union or the United Nations ("Sanctioned Subjects");
- (ii) have relationships with Sanctioned Subject or that with other means entail the breach of International Sanctions or the application of restrictive measures based on International Sanctions.

**Please use the following space to provide details in any case where any of the representations above cannot be provided, specifying the reference of the representation and the reasons why it cannot be provided:**

The presence of adequate and independent control functions in the areas of Internal Audit, Risk Management, Compliance, and Anti-Money Laundering, each adopting its own methodologies.

Within this framework, please indicate any outsourced control function, confirming that the outsourcing arrangements comply with the applicable regulatory requirements and that appropriate safeguards have been implemented:

B) The Entity agrees with the principles and standards set out in European Union and international legislation and best practices on anti-money laundering, tax avoidance, combating terrorism financing, anti-bribery and corruption and international sanctions (as recalled in the sections filled according to instructions received) and, when using CDP funds, shall

- 1) implement and comply with the policies and procedures it has adopted to promote and ensure compliance with such principles and standards and constantly monitor and supervise their effective functioning;
- 2) if it could not confirm it applies principles and standards listed in Part II and III of this Form, undertake actions needed to align its Compliance policies, procedures to such legislation and best practices, and inform CDP of specific issues in the implementation of such actions.

C) By subscribing this Covenant of Compliance, therefore, the Entity, when using CDP funds:

- 1) agrees to comply with this Covenant of Compliance and to inform CDP of any change or event which may have an impact on its validity and truthfulness;
- 2) accepts to preserve books and records relating to compliance with this Covenant of Compliance in accordance with applicable law and, in any case, for at least ten years from the date of substantial performance of the contract;
- 3) grants CDP and any auditor or third party appointed by it, as well as any competent authority, institution or body, the right to inspect and copy Entity books and records to verify compliance with this Covenant of Compliance;
- 4) acknowledges and accepts that in case of non-compliance with the Covenant of Compliance when using CDP funds, CDP may, in any case without prejudice of any contractual remedies provided in contracts, in finance documents or in other related or similar documents<sup>1</sup>:
  - a) require the Entity to provide any information and take all necessary remedial actions it deems satisfactory;
  - b) consider the Entity not to be eligible to be entered with CDP into future contracts and to receive new potential CDP funds;
  - c) seek whatever other remedy available under applicable laws.

CDP reserves the right not to enter any contract with an Entity that has not issued the Covenant of Compliance signed by a duly authorized person.

The undersigned is duly authorized to issue this declaration in the name and on behalf of the Entity and is aware that CDP will fully rely on the truthfulness, exactness, completeness and accuracy of this and the information contained therein.

<b>Signatory name:</b>		<b>Role held:</b>	
<b>Place and Date:</b>		<b>Signature:</b>	

<sup>1</sup> CDP reserves the right to terminate any contract with an Entity that has not issued the Covenant of Compliance signed by a duly authorized person.



## PART II. FUND DETAILS

### Section 1: FUND MANAGER PROFILE

By signing this Form, the interested party declares to have read the "Information notice" section at the end of the Form. **The information contained in this Form, once completed, is to be considered confidential.**

#### A. IDENTIFICATION DATA

**Registered legal name (hereinafter "the Entity"):**

**Tax Code (if not applicable, mark N.A.)<sup>2</sup>:**

**Legal address:**

**City:**

**Country:**

**Competent Supervisory Authority/ies:**

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<sup>2</sup> Tax Code is included among the identification data if it is issued by the Italian Revenue Agency.



## Section 2: FUND MANAGER BENEFICIAL OWNERSHIP

*"Beneficial owner" means any natural person(s) who ultimately owns or controls the Fund Manager and/or the natural person(s) on whose behalf a transaction or activity is being conducted. For each beneficial owner, the information requested below must be submitted, along with the criteria to determinate it (as set out in Annex 1) and the qualification as a politically exposed person (as set put in Annex 2).*

*In this form, it is possible to indicate up to three beneficial owners. Please, replicate the following section to indicate additional beneficial owners.*

***Please attach to this form a representative diagram of the entire ownership structure.***

## Asset Interposition Vehicles

*Please indicate whether the ownership structure includes any asset interposition vehicles (such as trusts and similar legal arrangements) holding 20% or more of the Fund Manager's shares.*

Should the response be positive, please provide the relevant documentation concerning the asset interposition vehicles, such as the fiduciary company's declaration, the trust deeds, and any subsequent amendments.

**Beneficial Owner (1)**

### *Identification data*

**Surname:**

Name: \_\_\_\_\_

### **Tax Code (if any)<sup>3</sup>:**

Date of Birth:

**Country of Birth:**

**Does the person belong to categories of Politically Exposed Persons (PEP)<sup>42</sup>** YES NO

If yes, please indicate the public role held and/or the relationship with a Politically Exposed Person and his/her role:

**Criteria used to determine the beneficial ownership (please refer to Annex 1):**

- 1) Ownership      a)      b)
- 2) Control

Please specify the role held and provide details on the type of control exercised (including the control through other means)

**3) Senior managing official(s)**

Please specify why no UBO is identified based on Ownership and Control

#### 4) Trusts and similar legal arrangements

a)  b)  c)  d)  e)

<sup>3</sup> Tax Code is included in the identification data if it is issued by the Italian Revenue Agency.

<sup>4</sup> Please, refer to the definition in the Annex 2.

**Beneficial Owner (2)***Identification data***Surname:****Name:****Tax Code (if any)<sup>3</sup>:****Date of Birth:****Country of Birth:****Does the person belong to categories of Politically Exposed Persons (PEP)<sup>4</sup>?**

YES

NO

*If yes, please indicate the public role held and/or the relationship with a Politically Exposed Person and his/her role:***Criteria used to determine the beneficial ownership (please refer to Annex 1):****1) Ownership**    a)                    b)**2) Control**

Please specify the role held and provide details on the type of control exercised (including the control through other means)

**3) Senior managing official(s)**

Please specify why no UBO is identified based on Ownership and Control

**4) Trusts and similar legal arrangements**a)        b)                    c)                    d)                    e)<sup>3</sup> Tax Code is included in the identification data if it is issued by the Italian Revenue Agency.<sup>4</sup> Please, refer to the definition in the Annex 2



### Beneficial Owner (3)

#### *Identification data*

**Surname:**

**Name:**

**Tax Code (if any)<sup>3</sup>:**

**Date of Birth:**

**Country of Birth:**

**Does the person belong to categories of Politically Exposed Persons (PEP)<sup>4</sup>?**

YES

NO

*If yes, please indicate the public role held and/or the relationship with a Politically Exposed Person and his/her role:*

#### **Criteria used to determine the beneficial ownership (please refer to Annex 1):**

**1) Ownership**    a)                    b)

**2) Control**

Please specify the role held and provide details on the type of control exercised (including the control through other means)

**3) Senior managing official(s)**

Please specify why no UBO is identified based on Ownership and Control

**4) Trusts and similar legal arrangements**

a)        b)                    c)                    d)                    e)

<sup>3</sup> Tax Code is included in the identification data if it is issued by the Italian Revenue Agency.

<sup>4</sup> Please, refer to the definition in the Annex 2



### Section 3: FUND PROFILE

#### A. FUND COMPLIANCE

*Please provide the following information concerning Fund compliance*

ID	QUESTION	YES	NO
1.	Please confirm that the Entity has adopted internal policies and procedures which provide for		
	a) the involvement of independent control functions in the Fund's investment/divestment decisions	<input type="checkbox"/>	<input type="checkbox"/>
	b) monitoring the correct use of Fund proceeds	<input type="checkbox"/>	<input type="checkbox"/>
	c) mechanisms to identify, manage, disclose to investors and resolve any conflict of interest (potential, current and historic) within the management of the Fund., and explain how they have been/are identified, managed, disclosed (to LPAC or otherwise) and resolved. Identify any committees in place to help with identifying and resolving conflicts (conflict committee, etc.).	<input type="checkbox"/>	<input type="checkbox"/>
	d) the performance of KYC (including anti-money laundering, anti-corruption and international sanctions) checks on the Fund investors		
	e) the performance of specific due diligence on target entities/projects	<input type="checkbox"/>	<input type="checkbox"/>
	f) complaints management		
If the answer to either point (i) or (ii) is "No", please specify who is appointed to perform the KYC procedures for AML purposes on the Fund target entities/projects and on the Fund's investors.			
2.	Please confirm that:		
	a) no findings have been made by the internal control functions as regards (i) investment/divestment decisions (ii) periodic reporting and disclosures	<input type="checkbox"/>	<input type="checkbox"/>
	b) no complaints have been received from nor disputes are in place with the Fund's customers	<input type="checkbox"/>	<input type="checkbox"/>
	c) no unresolved conflicts of interest have been identified in the management of the Fund	<input type="checkbox"/>	<input type="checkbox"/>
	d) no investigation, proceeding, conviction or judicial agreement for criminal/corporate liability/breach of applicable regulations has been threatened/started/issued/reached in relation to the management of the Fund	<input type="checkbox"/>	<input type="checkbox"/>
	e) no adverse audit finding/gap has been made on Entity its affiliated companies or the management of the Fund by internal audit department or external auditors, nor whistle-blowing report has been made concerning the management of the Fund	<input type="checkbox"/>	<input type="checkbox"/>



## B. CDP INVESTMENT STANDARDS

*Please indicate if, as concerns CDP investment in the Fund, the Fund's or subscription documents already provide for:*

1. The exclusion of investments in			
<input type="checkbox"/>	a) in countries subject to country-wide sanctions ( i.e. Iran, North Korea, Syria, Crimea, Russia, Non-Controlled Areas of Ukraine*, Belarus or Venezuela) or in projects/in favor of beneficiaries subject to sanctions *The expression "Non-Controlled Areas of Ukraine" means the areas of Ukraine not controlled by the Ukrainian government as defined in the notion of "specified territories" pursuant to Article 1 of Regulation (EU) no. 263/2022;		
<input type="checkbox"/>	b) jurisdictions identified as presenting strategic deficiencies in their AML-CFT regimes by relevant EU or International organizations		
<input type="checkbox"/>	c) specific sectors (such as alcohol, fur, gambling, pornography, tobacco and weapons)		
2. The following information/disclosure rights for investors (including CDP)			
<input type="checkbox"/>	a) prior disclosure concerning prospective investors, including outcome of KYC checks performed on them		
<input type="checkbox"/>	b) existing investors (including CDP) consent right concerning disclosed prospective investors		
<input type="checkbox"/>	c) reporting on Fund target entities/projects including outcome of KYC checks performed on them		
<input type="checkbox"/>	d) reporting on the use of Fund proceeds consistently with the purpose of CDP investment, including outcomes on the monitoring activities on them		
If reporting under letter c) or d) will be ensured, please indicate:		(i) reporting basis:	<input type="checkbox"/> complete (on all target entities/projects) <input type="checkbox"/> on sample basis <input type="checkbox"/> on aggregate basis <input type="checkbox"/> other _____
		(ii) reporting frequency	<input type="checkbox"/> quarterly <input type="checkbox"/> semi-annual <input type="checkbox"/> annual <input type="checkbox"/> other : _____

If the Entity could not confirm any of the above, please Indicate if it would be available to accept their inclusion in CDP subscription documents	YES <input type="checkbox"/>	NO <input type="checkbox"/>
If the answer is NO, please describe the underlying reasons and any further additional information deemed useful to understand such reasons/mitigant for non-inclusion of such provisions:		



### PART III. COMPLIANCE POLICIES, PROCEDURES AND STANDARDS

#### Section 1: ANTI-MONEY LAUNDERING AND COUNTER TERRORISM FINANCING

##### A. AML/CTF SUPERVISORY SYSTEM

*Please, provide information about the supervisory system in place in your jurisdiction to prevent and detect money laundering*

ID	QUESTION	YES	NO
1.	Is the Entity, in its home country, subject to laws addressed to counter money laundering and terrorism financing (AML/CTF)?	<input type="checkbox"/>	<input type="checkbox"/>
2.	If yes, do the anti-money laundering and anti-terrorism financing regulations include the obligation for the Entity to establish a designated officer that is responsible for coordinating and overseeing the AML/CTF internal framework?	<input type="checkbox"/>	<input type="checkbox"/>
3.	Is there a supervisory authority appointed for monitoring compliance with the obligations established by AML/CTF regulations?	<input type="checkbox"/>	<input type="checkbox"/>
	If yes, please provide the full name of the supervisory authority:		
4.	If yes, is the supervisory authority empowered to perform inspections on the financial sector operators to monitor compliance with the obligations established by the AML/CTF regulations?	<input type="checkbox"/>	<input type="checkbox"/>
5.	Does the Entity have an obligation to send the government supervisors / regulators a report whenever it knows, suspects or has reason to suspect that money-laundering or terrorism financing is being or has been carried out or attempted (suspicious transactions or suspicious activity reporting)?	<input type="checkbox"/>	<input type="checkbox"/>
6.	<p>Please confirm that</p> <p>a) no adverse AML/CFT finding/gap has been made on Entity or its affiliated companies or by the supervisory authority indicated at point 3, if any</p> <p>b) no adverse AML/CFT finding/gap has been made on Entity or its affiliated companies or by internal audit department or external auditors</p> <p><i>If it is not possible to provide any of the above confirmations, please describe the underlying reason and remedial actions undertaken:</i></p>	<input type="checkbox"/>	<input type="checkbox"/>

## B. AML/CTF FRAMEWORK

*Please provide information about your internal AML/CTF policies, practices and procedures*

ID	QUESTION	YES	NO
1.	Does the Entity have an AML/CTF Policy approved at least annually by the Entity's board or a senior committee?	<input type="checkbox"/>	<input type="checkbox"/>
2.	Is such AML/CTF Policy published, also in part, on the Entity's website?	<input type="checkbox"/>	<input type="checkbox"/>
3.	In addition to inspections by the government supervisors / regulators, does the Entity have an internal audit function or other independent auditor that assesses AML/CTF policies and practices on a regular basis?	<input type="checkbox"/>	<input type="checkbox"/>
4.	Has the Entity developed written policies or procedures documenting the processes that it has in place to prevent, detect and report suspicious transactions?	<input type="checkbox"/>	<input type="checkbox"/>
5.	Has the Entity developed written policies or procedures outlining the process regarding screening on sanctions, PEPs and negative media?	<input type="checkbox"/>	<input type="checkbox"/>
6.	Does the Entity have a risk-based assessment of its Customers and their transactions, in order to determine the appropriate level of due diligence based on the risk level that illicit activities be carried out at or through the Entity?	<input type="checkbox"/>	<input type="checkbox"/>
7.	Has the Entity established a "Know Your Customer" procedure including Customers' and beneficial owners' identification?	<input type="checkbox"/>	<input type="checkbox"/>
8.	If yes, does the "Know Your Customer" procedure include the ongoing monitoring, review and, where appropriate, update of the Customer information?	<input type="checkbox"/>	<input type="checkbox"/>
9.	Does the Entity have a requirement to record, file and retain information regarding its Customers?	<input type="checkbox"/>	<input type="checkbox"/>
10.	Does the Entity have a monitoring program for unusual and potentially suspicious activities?	<input type="checkbox"/>	<input type="checkbox"/>
11.	Does the Entity have a policy regulating accounts or relationships with shell banks? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence, and which is not affiliated with a regulated financial group)	<input type="checkbox"/>	<input type="checkbox"/>
12.	Does the Entity have policies providing for an enhanced due diligence to have relationships with Politically Exposed Persons, their family and close associates?	<input type="checkbox"/>	<input type="checkbox"/>
13.	Does the Entity have policies providing for an enhanced due diligence to have relationships with entities incorporated in jurisdictions identified by the FATF as jurisdictions with strategic deficiencies in their frameworks to combat money laundering and the financing of terrorism and proliferation (i.e. high-risk jurisdictions subject to a call for action and jurisdictions under increased monitoring).	<input type="checkbox"/>	<input type="checkbox"/>
14.	Are the Entity's AML/CTF policies and practices being applied to all branches and subsidiaries of the Entity, established both in the home country and in locations outside of that jurisdiction?	<input type="checkbox"/>	<input type="checkbox"/>
15.	Does the Entity have an AML/CTF training program for relevant employees?	<input type="checkbox"/>	<input type="checkbox"/>
16.	Does the Entity use third parties to carry out any components of its AML/CTF programme?	<input type="checkbox"/>	<input type="checkbox"/>
	If yes, provide details		

**Please, provide additional information on IT applications used for: (i) name detection against anti-terrorism list; (ii) transaction monitoring:**

### C. AML/CFT STANDARDS

**Without prejudice to representations, warranties, undertakings or other statements given or agreed in contracts, in finance documents or in other related or similar documents, the Entity represents that it acknowledges and agrees the following principles and standards.**

*Please tick the box to confirm principles and standards applied*

<input type="checkbox"/>	1. The Entity adopts risk-based measures to ensure that the risk of money laundering and terrorism financing associated with the investments of the Fund is low;
<input type="checkbox"/>	2. The risk-based measures adopted by the Entity are consistent with the Financial Action Task Force (FATF) international standard (e.g. 40 Recommendations), which inspired the principles and standards hereby represented;
3.	The Entity considers the geographical risk factors and shall in any case apply enhanced due diligence measures when it detects the involvement of:
<input type="checkbox"/>	a. high-risk third countries with strategic deficiencies identified according to Delegated Regulation (EU) 2016/1675 supplementing Directive (EU) 2015/849, taking into account information from the FATF but with the possibility to identify additional countries presenting strategic deficiencies in their AML/CFT regime;
<input type="checkbox"/>	b. non-cooperative jurisdictions for tax purposes, as adopted according to the EU Council conclusions of 5 December 2017 and periodically updated.
4.	KYC measures enacted by the Entity include at least:
<input type="checkbox"/>	a. acquisition and evaluation of publicly available information on the Client's reputation and, if applicable, on the quality of the supervisory regime and anti-money laundering controls to which the same is subject;
<input type="checkbox"/>	b. acquisition of information for clearly identifying the Clients' ownership structure, including the identification of ultimate beneficial owner;
<input type="checkbox"/>	c. the acquisition of information to fully understand the nature of the Clients' activities.
5.	The Entity adopts organizational and controlling measures to exclude that the Fund's investment can be used in the interest of individuals or companies included in any list of persons and/or entities target of asset-freezing or similar measures.



## Section 2: TAX TRANSPARENCY

### A. TAX TRANSPARENCY DECLARATIONS

#### 1. Please indicate if:

- a) the Fund
- b) the Fund manager
- c) the Fund's co -investors holding a stake above 10%
- d) beneficial owners of Fund's co -investors holding a stake above 10%

have their legal seat/place of residence in a Country of Barrage<sup>4</sup>

If yes, please identify the relevant individual/entity referred to in letters a), b) and c), the legal seat/residence country:

Type of subject ((a), b), c))	Subject (name surname/legal name)	Country

#### 2. If the relevant individual/entity referred to in letters a) or b) have their legal seat in a Country of Barrage please confirm that:

- 2.1. there are sound business reasons (other than tax reasons) for such structure and that it is not structured so to take advantage of the technicalities of a tax system or of mismatches between two or more tax systems for the purpose of reducing tax liability;  YES  NO
- 2.2. they have effective physical location links with such country (for example: a significant proportion of the investments in tangible and/or intangible assets are made within such country, operations in such country are carried out through local offices, revenues are generated locally, staff is employed locally and/or taxes are being paid locally)  YES  NO
- 3. Please indicate if the individual/entity referred to in letters a) or b) having their legal seat in a Country of Barrage were the recipients of a definitive decision, also of an administrative nature, of assessment or subject of disputes or proceedings by the competent authorities regarding:
  - 3.1. failure to comply with the obligations relating to the payment of taxes and duties or with the obligations relating to the payment of social security contributions according to applicable law;  YES  NO
  - 3.2. the establishment of an entity in any jurisdiction with the intention of evading tax, social security or other legal obligations  YES  NO

If yes, please identify the relevant individual/entity referred to in letters a), b) and c), and provide the details required

Type of subject ((a), b), c))	Subject (name surname/legal name)	Authority	Description of the conduct ascertained by the final decision or object of dispute or proceedings and the state of the same

If any of the answers to point 2 or 3 above is Yes, please provide any useful additional information concerning the answer provided or attach reference documents which might be useful to substantiate the sound business reasons for links identified:

<sup>4</sup> Countries for which the competent European and international authorities have found an unsatisfactory application of the internationally agreed standards on anti-money laundering and prevention of terrorist financing and, jointly, tax transparency. For the purposes of this Form, such countries are Trinidad and Tobago, Vanuatu, British Virgin Islands, Vietnam and Russian Federation.



***To be filled just when the Entity at point 1) below declared any link to a Country of Barrage***

**Without prejudice to the representations, warranties, undertakings or other statements given or agreed in contracts, in finance documents or in other related or similar documents, the Entity represents that it acknowledges and agrees the following principles and standards.**

*Please tick the box to confirm principles and standards applied*

***The Entity:***

<input type="checkbox"/>	1. is compliant with the applicable national, European or international laws and to that extent refrains from artificial arrangements aimed at tax avoidance;
<input type="checkbox"/>	2. confirms that the project localization is primarily motivated by economic substance and is not driven by tax reasons;
<input type="checkbox"/>	3. confirms that its intra-group transactions (if any) are compliant with the arm's length principle and/or, if required by applicable law, relevant transfer pricing documentation was prepared and provided to relevant tax authorities.



### Section 3: INTERNATIONAL SANCTIONS

Without prejudice to the representations, warranties, undertakings or other statements given or agreed in contracts, in finance documents or in other related or similar documents, the Entity represents that it acknowledges and agrees the following principles and standards.

*Please tick the box to confirm principles and standards applied*

**The Entity:**

<input type="checkbox"/>	1. promotes compliance with international sanctions and it does not engage in activities that would undermine compliance with the restrictive measures; it ensures the widest dissemination within and outside the company also conducting sanctions related training for the members of its Corporate Bodies as well as its employees and ensures that sanctions clauses are included in agreements with third parties;
<input type="checkbox"/>	2. ensures that any violation or ascertained circumvention of international sanctions will be assessed and punished without prejudice to any sanctions provided for by applicable regulations internally (e.g. by the application of internal fees or other labour law remedies) and externally (e.g. through relevant contractual remedies);
<input type="checkbox"/>	3. adopts formalized processes and organizational safeguards for the activities identified as having a higher risk of international sanctions which also ensures the execution of preventive sanctions related due diligence through a risk-based analysis and the right to refrain from having business relations with a third party when there is a doubt of non compliance with or potential circumvention of international sanctions;

***If any of the principles and standards listed above is not applied, please complete the following section:***

#### A. INTERNATIONAL SANCTIONS FRAMEWORK

*Please provide information about your internal International Sanctions policies, practices and procedures*

ID	QUESTION	YES	NO
1.	Does the Entity have a dedicated function/officer in charge for the implementation of the International Sanctions compliance program and/or an internal audit function or other independent auditor that assesses International Sanctions compliance on a regular basis?	<input type="checkbox"/>	<input type="checkbox"/>
2.	Does the Entity ensure compliance with restrictive measures and sanctions programs issued by UN, US, UE and domestic competent Authorities	<input type="checkbox"/>	<input type="checkbox"/>
3.	Please indicate if the Entity has adopted/established/implemented international sanctions policies and procedures approved by the Entity's board or a senior committee including:		
	a) risk assessment and sanctions-related due diligence for the counterparties/activities/geographic areas, identified as having a higher risk of international sanctions (including expositions towards highly sanctioned jurisdictions - i.e. Iran, North Korea, Syria, Crimea, Russia, Belarus, Non-Controlled Areas of Ukraine* or Venezuela)	<input type="checkbox"/>	<input type="checkbox"/>
	b) transaction testing;	<input type="checkbox"/>	<input type="checkbox"/>
	c) International sanctions training for its personnel	<input type="checkbox"/>	<input type="checkbox"/>
	d) a system for reporting of suspect or known sanctions-related violations and/or circumvention practices and a formalized review of high-risk transactions and/or suspect sanctions-related violations	<input type="checkbox"/>	<input type="checkbox"/>
	e) inclusion of international sanctions non-circumvention and export control clauses in agreements with third parties	<input type="checkbox"/>	<input type="checkbox"/>
4.	Please confirm that the abovementioned international sanctions compliance program and policies and procedures are adopted and implemented by all companies of Entity Group	<input type="checkbox"/>	<input type="checkbox"/>

\*The expression "Non-Controlled Areas of Ukraine" means the areas of Ukraine not controlled by the Ukrainian government as defined in the notion of "specified territories" pursuant to Article 1 of Regulation (EU) no. 263/2022.

**Please, provide any additional information deemed useful on tools used for performing sanctions-related due diligence on (i) counterparties and (ii) goods, services and activities:**



## Section 4: ANTI-BRIBERY AND CORRUPTION

Without prejudice to any representations, warranties, undertakings or other statements given or agreed in contracts, in finance documents or in other related or similar documents, the Entity represents that it acknowledges and agrees the following principles and standards.

*Please tick the box to confirm principles and standards applied*

### The Entity:

<input type="checkbox"/>	1. adopts anti-corruption principles and standards and ensures the widest dissemination within and outside the company also conducting training for the members of its Corporate Bodies as well as its employees and ensuring that anti-corruption clauses are included in agreements with third parties;
<input type="checkbox"/>	2. has zero tolerance for acts of corruption and prohibits them from being committed in any form, both direct and indirect and ensures that, without prejudice to any sanctions provided for by applicable regulations, any violation of the anti-corruption principles and standards adopted will be assessed and punished internally (e.g. by the application of internal fees or other labour law remedies);
<input type="checkbox"/>	3. adopts formalized processes and organizational safeguards for the activities identified as having a higher risk of corruption which also ensure the execution of preventive anti-corruption due diligence through a risk-based analysis and the right to refrain from having business relations with a third party when there is a doubt that acts of corruption may have been or could be committed;

*If any of the principles and standards listed above is not applied, please complete the following section:*

### A. ABC FRAMEWORK

*Please, provide information about your internal ABC policies, practices and procedures*

ID	QUESTION	YES	NO
1.	Does the Entity have a dedicated function/officer in charge of implementation of the ABC compliance program and an internal audit function or other independent auditor that assesses ABC policies and practices on a regular basis?	<input type="checkbox"/>	<input type="checkbox"/>
2.	Please indicate if the Entity has adopted/established/implemented an ABC compliance program approved by the Entity's board or a senior committee including:		
	a) policies which prohibit so-called facilitation payments	<input type="checkbox"/>	<input type="checkbox"/>
	b) anti-corruption training for its personnel	<input type="checkbox"/>	<input type="checkbox"/>
	c) a system for reporting violations, suspected or known, of the laws or internal code of conducts/procedures (whistle-blowing)	<input type="checkbox"/>	<input type="checkbox"/>
	d) formalized processes and organizational safeguards for activities identified as having a higher risk of corruption (including recruitment of company personnel, sponsorships and no-profits initiatives, gifts and entertainment, suppliers selection)	<input type="checkbox"/>	<input type="checkbox"/>
	e) risk-based anti-corruption due diligence and contractual clauses (including on business partners and third parties acting on Entity behalf, initiatives)	<input type="checkbox"/>	<input type="checkbox"/>
	f) compliance policies on prevention and management of conflict of interests	<input type="checkbox"/>	<input type="checkbox"/>
3.	Please indicate if the Entity has adopted/established/implemented procurement policies and procedures which ensure:		
	a) transparency, rotation and equal treatment in the selection of suppliers, consultants, contractors;	<input type="checkbox"/>	<input type="checkbox"/>
	b) an effective and competitive objective selection process between a plurality of proposals or, when this competition is not carried out (i.e. single supplier or direct assignment is used), that this occurs for objective reasons	<input type="checkbox"/>	<input type="checkbox"/>
	c) checks, also through suitable documentation, regarding the technical, economic, legal, ethical criteria and, competence and organization requirements including technical skills and experience, quality systems and adequate resources of suppliers / service providers / consultants	<input type="checkbox"/>	<input type="checkbox"/>
	d) that the fees paid constitute exclusively the remuneration for legitimate goods / services are in line with market conditions and related invoices comply with contractual terms agreed	<input type="checkbox"/>	<input type="checkbox"/>
	e) suitable safeguards to avoid conflict of interest as concerns suppliers, consultants and contractors;	<input type="checkbox"/>	<input type="checkbox"/>



4.	Please confirm that the abovementioned policies and procedures are adopted and implemented by all companies of Entity Group	<input type="checkbox"/>	<input type="checkbox"/>
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<b>Please, provide any additional information deemed useful on tools used for performing risk-based anti-corruption due diligence:</b>



### SIGNATURE

The undersigned is duly authorized to issue this declaration in the name and on behalf of the Entity and is aware that CDP will fully rely on the truthfulness, exactness, completeness and accuracy of this and the information contained therein.

The undersigned undertakes to communicate to CDP in a timely manner any change to the information provided that may occur.

<i>Signatory name:</i>		<i>Role held:</i>	
<i>Place and Date:</i>		<i>Signature:</i>	

## ANNEX 1 - CRITERIA TO DETERMINE THE BENEFICIAL OWNER

*“Beneficial owner” means any natural person(s) who ultimately owns or controls the Fund Manager and/or the natural person(s) on whose behalf a transaction or activity is being conducted.*

***The criteria used to determine the beneficial ownership must be specified from the following:***

1. Natural person who holds:
  - a) a shareholding of 25% plus one share or an ownership interest of more than 25% (*direct ownership*);
  - b) A shareholding of 25% plus one share or an ownership interest of more than 25%, held through subsidiaries, trust companies or intermediaries (*indirect ownership*).
2. Natural person who ultimately controls the Fund Manager through the control of an enough percentage of the voting rights or ownership interest in that entity, including through bearer shareholdings, or through control via other means.

*In addition to the above, the ‘control through other means’ such as for example: close family relationships, historical or contractual relationships, constitutes a further case of control; using, enjoying or benefiting from the assets owned by the Fund Manager; responsibility for strategic decisions that fundamentally affect the business practices or general direction of a legal person; differentiated voting rights; the power to appoint the majority of the members of the board of directors or similar officers of the company, especially in cases where the appointment rights do not depend on the shareholding held; control through debt instruments, where a creditor or third party can control a legal entity or influence a shareholder based on the provisions of the loan agreement; control, shared or otherwise, through formal or informal agreements with owners, partners or companies; the use of formal or informal fiduciary appointment agreements.*
3. Natural person(s) who hold the position of senior managing official(s) if, after having exhausted all possible means, no person under points (1) and (2) is identified.
4. In the case of trusts, all the following persons:
  - a) the settlor(s);
  - b) the trustee(s);
  - c) the protector(s), if any;
  - d) the beneficiaries or where the individuals benefiting from the legal arrangement or entity have yet to be determined, the class of persons in whose main interest the legal arrangement or entity is set up or operates;
  - e) any other natural person exercising ultimate control over the trust by means of direct or indirect ownership or by other means.

## ANNEX 2 - DEFINITION "POLITICALLY EXPOSED PERSONS"

Politically Exposed Persons shall mean:

Natural persons who holds or has ceased to be entrusted for less than a year with prominent public functions and the immediate family members and persons known to be close associates of such persons, identified based on the following criteria:

1. natural persons who are or have been entrusted with prominent public functions shall mean:
  - a) heads of Country, heads of government, ministers and undersecretaries, head and assessor of region, mayor of provincial capital or metropolitan city, mayor of municipality with a population of not less than 15,000 inhabitants and similar offices in foreign countries;
  - b) members of parliament, European parliamentarian, regional councilor and similar offices in foreign countries;
  - c) member of central decision-making bodies of political parties;
  - d) members of supreme courts, constitutional courts and other high-level judicial bodies, whose rulings are not generally subject to further appeal, barring exceptional circumstances;
  - e) members of Country audit offices and of the boards of directors of central banks;
  - f) ambassadors, chargés d'affaires or equivalent positions in foreign countries, high-ranking officials in the armed forces or similar offices in foreign countries;
  - g) members of the administrative, management or supervisory bodies of subsidiaries control, even indirectly, by the Country or by a foreign Country or participated, with a prevalent or totalitarian measure, by the Regions, by provincial capitals and metropolitan cities and by municipalities with a total population of no less than 15,000 inhabitants;
  - h) general manager of ASL or hospital, university hospital and other national health service organizations;
  - i) director, deputy director and member of the management body or entity carrying out equivalent functions in international organizations;
2. Close relatives shall mean: parents, spouses or person linked in civil union or cohabitation in fact or similar institutions to politically exposed children and their spouses as well as persons linked to the children in civil union or cohabitation in fact or similar institutions;
3. For the purposes of identifying the persons with whom the natural persons listed in paragraph 1 above are known to have close relationships, reference shall be made to:
  - a) any natural person who is known to have joint beneficial ownership of legal entities or any other close business relationship with a person referred to in paragraph 1;
  - b) any natural person who is the sole beneficial owner of legal entities or legal persons known to have been de facto established for the benefit of a person referred to in paragraph 1.



## INFORMATION NOTICE

### 1. Data Controller

Pursuant to the European Regulation 2016/679 (below GDPR), Cassa Depositi e Prestiti S.p.A. (below, CDP), with head office in Rome, via Goito n. 4 (00185), processes your personal data in its capacity as "Data Controller" in compliance with the provisions of law and informing you of the use of said personal data. The Personal Data Protection Officer can be contacted by writing to the email address [privacy@cdp.it](mailto:privacy@cdp.it).

### 2. Sources and type of data processed

The personal data held by CDP are collected directly from the customers or from third parties, for example Public Administrations, Public Registers, Chambers of Commerce, Databases of private companies. The data processed by CDP can include personal information (*first name, surname, date of birth, address, image, sex, marital status, tax identification no., etc.*) and contact information. Furthermore, in complying with specific requirements relative to management of the business relationship (for example mandatory communications to the Authorities), and in the case of customer communications, CDP may process particular categories of data in accordance with art. 9 GDPR and data relating to criminal convictions and offences in accordance with art. 10 of the GDPR.

### 3. Purpose and legal basis of the data processing

The personal data are processed during the normal activity of CDP according to the following purposes: a) Purposes strictly connected with and instrumental to the establishment and management of relations with the customers pursuant to art. 6 paragraph 1 letter b) GDPR; b) purposes deriving from legal obligations, regulations, EU law, provisions issued by authorities authorized for the purpose by the law or by supervisory and control bodies pursuant to art. 6 paragraph 1 letter c) GDPR. Provision of personal data for the above purposes is necessary to finalize, carry out or continue the contract relationship with CDP.

### 4. Data processing method

In relation to the purposes specified, processing of the personal data is carried out by manual, IT and telematic instruments using logic appropriate for the purposes and, in any case, such as to guarantee the security and confidentiality of the data. Protection is ensured also in the presence of innovative instruments introduced by CDP.

### 5. Storage of personal data

Your personal data will be stored only for the time necessary for the purposes for which they are collected in accordance with the principle of minimization pursuant to art. 5.1.c) GDPR.

### 6. Categories of subjects to whom the data can be communicated

For pursuit of the above purposes, CDP may communicate your personal data to third parties if said data communication operations are instrumental to the services requested and provided. Your data may furthermore be communicated to managers of private credit information systems. Further communications will be possible to guarantors, if relevant to the existing guarantee relationship. Your data may furthermore be communicated to companies forming part of the group, for administrative and accounting purposes, and to third parties in compliance with legal requirements. The subjects belonging to the above-mentioned categories perform the function of Data Supervisor or operate totally autonomously as distinct Data Controllers.

### 7. Transfer data outside the EU

CDP will carry out the processing in accordance with the procedures permitted by the current law, such as consent of the Data Subject, adoption of standard clauses approved by the European Commission, selection of subjects adhering to international programs for the free circulation of data or operating in countries considered safe by the European Commission.

### 8. Rights of the Data Subject

You are informed that art. 15-22 GDPR entitle the Data Subjects to exercise specific rights. These rights can be exercised by request sent by post to Cassa depositi e prestiti S.p.A., via Goito, n. 4, 00185 Rome, att. Personal Data Protection Officer, or by email directly to said Officer, at the contacts provided in point 1. The Data Subject also has the right to raise complaints with the Italian Data Protection Authority.